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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
CARLOS ALBERTO BAQUEDANO,  
  
Defendant.

Case No. CR 3-24-71769 MAG

**STIPULATION AND ORDER TO  
CONTINUE STATUS CONFERENCE**

Defendant Carlos Alberto Baquedano and the United States hereby stipulate and agree as follows:

1) A status conference is currently scheduled for December 16, 2025. The parties are discussion potential resolution and agree that a continuance of the status conference is needed to allow continued review of discovery. The government has produced a very large volume of discovery, including for events across many months and extensive wiretap evidence.

2) The parties therefore stipulate and agree and respectfully request that the status conference be continued to January 22, 2026.

3) It is further stipulated that time be excluded under the Speedy Trial Act and Rule 5.1(c) from December 16, 2025 through January 22, 2026. The parties stipulate and agree that excluding time will allow for the effective preparation of defense counsel. *See* 18 U.S.C. §

1 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by  
2 excluding time from computation under the Speedy Trial Act and Rule 5.1(c) outweigh the best  
3 interests of the public and the defendants in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

4 4) The parties further stipulate that there is good cause for extending the time limits  
5 for a preliminary hearing under Federal Rule of Criminal Procedure 5.1. *See* Fed. R. Crim. P.  
6 5.1(d).

7 Undersigned defense counsel certifies that he has obtained approval from counsel for the  
8 government to file this stipulation and proposed order.

9 IT IS SO STIPULATED.

10 Dated: December 12, 2025

/s/

11 August Gugelmann  
12 SWANSON & McNAMARA LLP  
Attorneys for Carlos Alberto Baquedano

13 /s/

14 Kenneth Chambers  
Assistant United States Attorney

**ORDER**

Based on the stipulation of the parties and good cause appearing therefore, the status conference currently set for December 16, 2025 is continued to January 22, 2026.

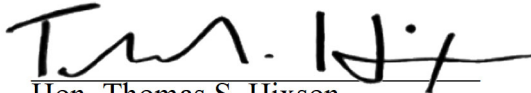
Based upon the facts set forth in the stipulation, and for good cause shown, the Court finds that failing to exclude the time from December 16, 2025 through January 22, 2026, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

The Court further finds that the ends of justice served by excluding time from computation under the Speedy Trial Act and Rule 5.1(c) outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from December 16, 2025 through January 22, 2026 shall be excluded from computation under the Speedy Trial Act and the time period set forth in Rule 5.1(c). 18 U.S.C. § 3161(h)(7)(A), (B)(iv); Rule 5.1(d).

Furthermore, the Court finds that, with the consent of the defendant, there is good cause for extending the time limits for a preliminary hearing under Federal Rule of Criminal Procedure 5.1. *See* Fed. R. Crim. P. 5.1(d).

IT IS SO ORDERED.

Dated: December 12, 2025

  
Hon. Thomas S. Hixson  
United States Magistrate Court